

Reply-To: William Hamilton - QQC <william.hamilton@gsa.gov>
Message-ID: <0000000000006c05bb05e16d2b4a@google.com>
Date: Tue, 14 Jun 2022 19:11:19 +0000
Subject: Document shared with you "DRAFT MBL Technologies Formal CAP Notice 061422"
From: "William Hamilton - QQC (via Google Docs)" <drive-shares-dm-noreply@google.com>
To: laurie.southerton@gsa.gov
Cc: brian.conrad@gsa.gov, evan.isaacs@gsa.gov
X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: 5a3de445b01f839224dad0d140d95e41


william.hamilton@gsa.gov shared a document



william.hamilton@gsa.gov has invited you to **edit** the following document:

Hi Brian - Here is a final draft of the MBL Technologies formal CAP notice regarding their poor assessment for Issio. As discussed earlier, MBL used unqualified personnel and provided incomplete / inaccurate assessment deliverables. If you need any o her info, just let me know.

Thanks -
John

 DRAFT_MBL Technologies Formal CAP Notice_061422

Open

Date: Wed, 15 Jun 2022 13 37:57 -0700
Reply-to: Reply <d+AORGpRcj-F1aSrvXHSZXb47Ct81IAbjMoiLdHuaXNn6FBEMea3ISzrxnGV11EUhVWvbmL3MReW6ainfq4UijADx-FxhUYWW2DiesmkWckBdbzwuE38FJGJgV1kBGsgFUD4-sekt27IP@docs.google.com>
Message-ID: <Wufridyfiw NLGQKQGLJdQ@notifications.google.com>
Subject: MBL Technologies ... - @laurie.southerton@gsa.gov is that wh...
From: "Jennifer Carlson - QQC-C (Google Docs)" <comments-noreply@docs.google.com>
To: laurie.southerton@gsa.gov
X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: 5d90f63189a79c76dff2a89dda949213

Jennifer Carlson - QQC-C (jennifer.carlson@gsa.gov) assigned you an action item in the following document

 MBL Technologies In Remediation 15JUN2022



1 comment

certifier,



Jennifer Carlson - QQC-C • 4:32 PM, Jun 15 (EDT) New
@laurie.southerton@gsa.gov is that what we call them?
Assigned to you

[Open](#)

[View files with action items assigned to you](#)


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Message-ID: <IZf1-INWEnum7qMztO1T9A@notifications.google.com>
Subject: MBL Technologies ... - Format bold, font
From: (b) (6) - QQC-C (Google Docs)" <comments-noreply@docs.google.com>
To: laurie.southernton@gsa.gov
X-Source-Folder: GSA-2022-001178-laurie.southernton@gsa.gov_0
X-Email-Hash-MD5: e0fa8c754ba5945e8e4f0c0d5c7f6b1f

Evan Isaacs - QQC-C accepted a suggestion in the following document

 MBL Technologies Assessment of Issio 10JUN2022

 1 resolved

Suggestions

(b) (6)

QQC-C • 4:39 PM, Jun 10 (EDT)

Format bold, font

(b) (6)

QQC-C • 4:41 PM, Jun 10 (EDT) New

Accepted suggestion

Open

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Reply-to: Reply <d+AORGpRdL6EGyw-FCOAVnk9Szd4o9KyoQSTPSfVOTC8yrkgyTpckVDGwJ3sRqmOBaP7o-iRTMjajvOmZYOTySsQZOWjPVJbBNXQAib5g99SMRrVkmplMSY5rDwPiCy5fYPJjeiDqkjc@docs.google.com>
Message-ID: <MBdNA4xcg4Vlg-kOviiLw@notifications.google.com>
Subject: MBL Technologies ... - Link this text to the appropriate TCW
From: (b) (6) - QQC-C (Google Docs)" <comments-noreply@docs.google.com>
To: laurie.southerton@gsa.gov
X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: aa54c33e78d4e9e67434027ba486519d

Evan Isaacs - QQC-C resolved a comment in the following document


 MBL Technologies Assessment of Issio 10JUN2022


 1 resolved

Comments

National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53A Rev 4 testing criteria

(b) (6) - QQC-C • 8:41 AM, Jun 11 (EDT)
Link this text to the appropriate TCW

 Laurie Southerton - QQC-C • 12:02 PM, Jun 12 (EDT)
Linked to Low TCW.

(b) (6) - QQC-C • 8:38 AM, Jun 13 (EDT) 
Marked as resolved

[Open](#)

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From: "(b) (6)" - QQC-C (Google Docs)" <comments-noreply@docs.google.com>
To: laurie.southerton@gsa.gov
X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: 4f75e13ea3f60cfa0e07ee8cd951572f

New activity in the following document

MBL Technologies Assessment of Issio 10JUN2022

2 comments

Recently,

(b) (6)

- QQC-C • 3:50 PM, Jun 10 (EDT) **New**

It would be best to include dates, if possible. Or - a timeframe, like "over the last 60 days during the FedRAMP package review of Issio..."

Reply

Open

National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53A Rev 4 testing criteria

(b) (6)

- QQC-C • 3:51 PM, Jun 10 (EDT) **New**

Can this be linked to a FR document? Or if it's not an FR doc, a link to a doc where FedRAMP says this is the criteria the program uses.

Reply

Open

5 suggestions

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) **New**

Replace "w" with "W"

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) **New**

Replace "r" with "I"

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) **New**

Replace "m" with "M"

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) **New**

Replace "c" with "C"

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) **New**

Delete "s"

Reply

Open

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To: laurie.southernton@gsa.gov
X-Source-Folder: GSA-2022-001178-laurie.southernton@gsa.gov_0
X-Email-Hash-MD5: 806ae1d635ebfeaa9f99f1f5c63be9ed

New activity in the following document

MBL Technologies Assessment of Issio 10JUN2022

1 comment

It is reported to me that Mr. BeasleyEric, more so than Mr. EvansmKameran, was in over his head as the Assessor. He failed to successfully answer most of the Review Team's questions, when asked.

(b) (6) - QQC-C • 4:17 PM, Jun 10 (EDT) **New**

This statement should be fact-based - so I changed the wording slightly.

Reply

Open

19 suggestions

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) **New**

Replace "Per" with "As reported to the FedRAMP PMO by"

Reply

Open

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) **New**

Replace "the" with "MBL"

Reply

Open

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) **New**

Replace "following individuals are" with "has"

Reply

Open

Evan Isaacs - QQC-C • 7:00 PM, Dec 31, 1969 (EST) **New**

Add "enlisted the following iindividuals who"

Reply

Open

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) **New**

Add "- none of whom p[articipatred in this asse"

Reply

Open

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) **New**

Replace ". Kameran" with "M"

Reply

Open

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) **New**

Replace "and" with "but"

Reply

Open

(b) (6)

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Replace "P" with "Furthermore, p"

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Replace "Eric" with "MBL is non-compliant with the R311 - Specific Requirements: Federal Risk and Authorization Managemen..."

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Format list add to list

Format indent first line, indent left

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Replace "." with "r."

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Format list add to list

Format indent first line, indent left (3 times)

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Delete paragraph

Delete space

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Add "he"

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Replace "Eric" with "Mr. Beasley"

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Replace "Kameran, was in over his head as the Assessor. He" with "Mr. Evansm"

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Replace "." with ", when asked"

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Add "successfully"

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Replace "It is" with "Furthermore, the FedRAMP Agency Review Team"

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From: (b) (6) QQC-C (Google Docs)" <comments-noreply@docs.google.com>
To: laurie.southern@gsa.gov
X-Source-Folder: GSA-2022-001178-laurie.southern@gsa.gov_0
X-Email-Hash-MD5: 22392c6e150431982b7f6001ef6172ed

New activity in the following document

MBL Technologies Assessment of Issio 10JUN2022

2 comments

CSO assessment

(b) (6)

QQC-C • 4:27 PM, Jun 10 (EDT)

New

Can you include the page number?

Reply

Open

#####

(b) (6)

QQC-C • 4:31 PM, Jun 10 (EDT)

New

Date this is due by

Reply

Open

9 suggestions

(b) (6)

QQC-C • 7:00 PM, Dec 31, 1969 (EST)

New

Add "(page #, Table 5-1 Security Testing team"

Reply

Open

(b) (6)

QQC-C • 4:25 PM, Jun 10 (EDT)

New

Format bold, font

(b) (6)

QQC-C • 4:25 PM, Jun 10 (EDT)

New

Accepted suggestion

Reply

Open

(b) (6)

QQC-C • 7:00 PM, Dec 31, 1969 (EST)

New

Replace "these folks are the only two listed in" with "≈"

Reply

Open

(b) (6)

QQC-C • 7:00 PM, Dec 31, 1969 (EST)

New

Add "only includes the names of the two aforementioned individuals"

Reply

Open

(b) (6)

QQC-C • 7:00 PM, Dec 31, 1969 (EST)

New

Replace "This means that the 3PAO did not have the third FTE on this assessment."with "The R311, section 5.2.3 F.1 requires three FTEs to complete the assessment."

Reply

Open

(b) (6)

QQC-C • 7:00 PM, Dec 31, 1969 (EST)

New

Delete image

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST)

New

Add

"elements outlined above, in addition to the"

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST)

New

Add

"quality of the"

Reply

Open

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST)

New

Add

"In accordance with FedRAMP 3PAO Obligations and Performance Guide your organization is required to s..."

Reply

Open

✓

1 resolved

Suggestions

(b) (6)

- QQC-C • 4:24 PM, Jun 10 (EDT)

New

Delete

"Poor Review Meeting Performance - OrchestrationThe review meeting was very poorly orchestrated by th..."

(b) (6)

- QQC-C • 4:26 PM, Jun 10 (EDT)

New

Accepted suggestion

Reply

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From: (b) (6) - QQC-C (Google Docs)" <comments-noreply@docs.google.com>
To: laurie.southerton@gsa.gov
X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
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New activity in the following document

MBL Technologies Assessment of Issio 10JUN2022

1 comment

Poor Quality Assessment - The FedRAMP Agency Review Team reported that Mr. Beasley and (b) (6) failed to successfully answer most of the Review Team's questions, when asked.

(b) (6) - QQC-C • 4:36 PM, Jun 10 (EDT) New
Cite the issues here

Reply Open

17 suggestions

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) New
Add "Poor Quality Assessment - The FedRAMP Agency Review Team reported that Mr. Beasley and Mr. Evans fai..."

Reply Open

(b) (6) - QQC-C • 4:36 PM, Jun 10 (EDT) New

Delete paragraph
Delete space

(b) (6) - QQC-C • 4:36 PM, Jun 10 (EDT) New
Accepted suggestion

Reply Open

(b) (6) - QQC-C • 4:37 PM, Jun 10 (EDT) New
Add "R311 - Specific Requirements: Federal Risk and Authorization Management Program (FedRAMP) ITEM 2 -"

Evan Isaacs - QQC-C • 4:39 PM, Jun 10 (EDT) New
Accepted suggestion

Reply Open

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) New
Replace "Per the" with "ITEM 3 -"

Reply Open

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) New
Delete "In an effort to allow the Issio Low system to be FedRAMP-authorized at Low, the Agency Review Team a..."

Reply Open

(b) (6) - QQC-C • 4:38 PM, Jun 10 (EDT) New
Format bold, font

(b) (6) - QQC-C • 4:39 PM, Jun 10 (EDT) New

Accepted suggestion

[Reply](#)

[Open](#)

(b) (6)

- QQC-C • 4:38 PM, Jun 10 (EDT) [New](#)

Delete "ITEM 2 - R311, 5.2.3 F.1 All assessments must be staffed by an appropriate number of team members ba..."

(b) (6)

- QQC-C • 4:39 PM, Jun 10 (EDT) [New](#)

Accepted suggestion

[Reply](#)

[Open](#)

(b) (6)

- QQC-C • 4:38 PM, Jun 10 (EDT) [New](#)

Add "ITEM 1 -"

(b) (6)

- QQC-C • 4:39 PM, Jun 10 (EDT) [New](#)

Accepted suggestion

[Reply](#)

[Open](#)

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) [New](#)

Delete space

Add "R311"

[Reply](#)

[Open](#)

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) [New](#)

Add "ITEM 2 - R311, 5.2.3 F.1 All assessments must be staffed by an appropriate number of team members ba..."

[Reply](#)

[Open](#)

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) [New](#)

Add "R311"

[Reply](#)

[Open](#)

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) [New](#)

Format bold, font

[Reply](#)

[Open](#)

(b) (6)

- QQC-C • 4:39 PM, Jun 10 (EDT) [New](#)

Delete paragraph (3 times)

(b) (6)

- QQC-C • 4:39 PM, Jun 10 (EDT) [New](#)

Accepted suggestion

[Reply](#)

[Open](#)

(b) (6)

- QQC-C • 4:39 PM, Jun 10 (EDT) [New](#)

Add paragraph

(b) (6)

- QQC-C • 4:39 PM, Jun 10 (EDT) [New](#)

Accepted suggestion

[Reply](#)

[Open](#)

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) [New](#)

Format bold, font

[Reply](#)

[Open](#)

(b) (6)

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) New
Add "R311"

[Reply](#)

[Open](#)

(b) (6) - QQC-C • 4:39 PM, Jun 10 (EDT) New
Made a suggestion

[Reply](#)

[Open](#)

✓ 5 resolved

Comments

It is reported to me that Mr. BeasleyEric, more so than (b) (6), was in over his head as the Assessor. He failed to successfully answer most of the Review Team's questions, when asked.

(b) (6) - QQC-C • 4:17 PM, Jun 10 (EDT)
This statement should be fact-based - so I changed the wording slightly.

(b) (6) - QQC-C • 4:35 PM, Jun 10 (EDT) New
Marked as resolved

[Reply](#)

[Open](#)

Suggestions

(b) (6) - QQC-C • 4:18 PM, Jun 10 (EDT) New
Delete paragraph
Replace "Per" with "As reported to the FedRAMP PMO by"

(b) (6) - QQC-C • 4:36 PM, Jun 10 (EDT) New
Accepted suggestion

[Reply](#)

[Open](#)

(b) (6) - QQC-C • 4:16 PM, Jun 10 (EDT) New
Delete "Furthermore, the FedRAMP Agency Review Team It is reported to me that Mr. BeasleyEric, more so than ..."

(b) (6) - QQC-C • 4:35 PM, Jun 10 (EDT) New
Accepted suggestion

[Reply](#)

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(b) (6) - QQC-C • 4:17 PM, Jun 10 (EDT)
Replace "It is" with "Furthermore, the FedRAMP Agency Review Team"

(b) (6) - QQC-C • 4:35 PM, Jun 10 (EDT) New
Accepted suggestion

[Reply](#)

[Open](#)

(b) (6) - QQC-C • 4:23 PM, Jun 10 (EDT)
Format indent first line, indent left

(b) (6) - QQC-C • 4:35 PM, Jun 10 (EDT) New
Accepted suggestion

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To: laurie.southern@gsa.gov
X-Source-Folder: GSA-2022-0011178-laurie.southern@gsa.gov_0
X-Email-Hash-MD5: f50c2494ada32501f960771668d2816f

New activity in the following document

MBL Technologies Assessment of Issio 10JUN2022

3 comments

National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53A Rev 4 testing criteria

(b) (6) - QQC-C • 8:41 AM, Jun 11 (EDT) **New**
Link this text to the appropriate TCW

Reply Open

[####]

(b) (6) - QQC-C • 8:43 AM, Jun 11 (EDT) **New**
Include date they need to submit it (10 days from the date the letter is sent?)

Reply Open

Poor Quality Assessment - The FedRAMP Agency Review Team reported that Mr. Beasley and (b) (6) failed to successfully answer most of the Review Team's questions, when asked.

(b) (6) - QQC-C • 4:36 PM, Jun 10 (EDT)
Cite the issues here

Laurie Southern - QQC-C • 4:42 PM, Jun 10 (EDT)
ok but how bout on Monday? If i get some time this weekend, I might be able to get the issues cited. I will try.

(b) (6) - QQC-C • 8:37 AM, Jun 11 (EDT) **New**
I think you included it above in the comments - I moved it to the references

(b) (6) - QQC-C • 8:37 AM, Jun 11 (EDT) **New**
Marked as resolved

Reply Open

1 resolved

Comments

National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53A Rev 4 testing criteria

(b) (6) - QQC-C • 3:51 PM, Jun 10 (EDT)
Can this be linked to a FR document? Or if it's not an FR doc, a link to a doc where FedRAMP says this is the criteria the program uses.

Laurie Southern - QQC-C • 4:23 PM, Jun 10 (EDT)
Yeah - well the testing document in the SAR is the Test Case Workbook (TCW) which is derived from NIST testing criteria. It is one of the documents that a 3PAO has to provide for every initial and annual assessment.

Laurie Southern - QQC-C • 4:25 PM, Jun 10 (EDT)
Gap review Notes 5/22/2022: SAP and SAR (these are specifically the 3PAO documents)

SAP - Several noted discrepancies concerning SAP that were not addressed relating to removing sections from SAP, rules of engagement portions missing, sampling methodology missing. 3PAO note findings in Final review report and incorporate actions in future assessments.

SAR - Problems with SAR noted:

Risk Exposure Table (RET) -

Source of Discovery Column incorrectly filled out - 3PAO should follow guidance in RET table and fill out correctly in all future Assessments.

Name column should adequately note the name of the vulnerability for easy tracking; for example, the name specified in the vulnerability scan tool and include the Plug-in ID
The description for vulnerability scan findings should note the description provided by the scan tool used.

SAR Section 6, Risks Known for Interconnected Systems - Does not adequately capture all external services. It should catalog all external services, not just those that are FedRAMP authorized, but also those that provide updates as well as services lacking FedRAMP authorization. In the next AA for this Service and all future assessments, 3PAO should capture ALL interconnections.

Test Case O&Es - As noted in concerns addressed regarding critical controls, several of the O&Es in the test cases in adequately describe what and how the 3PAO determined findings status. There will be additional comments in review report that 3PAO should heed.

Scans - No raw scans provided with SAR. In future, 3PAO MUST provide all RAW scans!
Risk documentation - The Risks are inconsistently identified in the SAR. Final review report will note. The 3PAO is expected to QA its work for accuracy, completeness, and consistency before submitting to customer/agency/PMO

(b) (6)

- QQC-C • 8:40 AM, Jun 11 (EDT) New

Marked as resolved

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Message-ID: <f1x5vH1CLAKyi4p0IHmJLw@notifications.google.com>
Subject: MBL Technologies Assessment of Issio 10JUN2022
From: "(b) (6)" - QQC-C (Google Docs)" <comments-noreply@docs.google.com>
To: laurie.southern@gsa.gov
X-Source-Folder: GSA-2022-001178-laurie.southern@gsa.gov_0
X-Email-Hash-MD5: 8c2436cabb4c4bdad02eeca298fac95

New activity in the following document

MBL Technologies Assessment of Issio 10JUN2022

18 suggestions

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Replace "issuesspecifically Eric Beasley and Kameran Evans were reported by the FedRAMP Agency Review Team to..." with "experienced several severe"

ReplyOpen

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Replace "regards" with "regarding"

ReplyOpen

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Format bold, font

ReplyOpen

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Format bold, font

ReplyOpen

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Format bold, font

ReplyOpen

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Replace "I am not sure why Eric and (b) (6) were the point people on this Assessment as they should only be" with "MBL should not have put Mr. Beasley and (b) (6) on an assessment in these roles as they did not me..."

ReplyOpen

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Add "only"

ReplyOpen

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Delete "ing"

ReplyOpen

(b) (6)

- QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Replace "since they do not have" with "without"

ReplyOpen

(b) (6)

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Add "Lack of Qualified Assessment Personnel -"

[Reply](#)

[Open](#)

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Format list add to list

Format indent first line, indent left

[Reply](#)

[Open](#)

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Replace "OrchestrationThe review meeting was very poorly" with "Poor Review Meeting Performance -"

[Reply](#)

[Open](#)

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Add "FedRAMP"

[Reply](#)

[Open](#)

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Replace "certificationsr.. Kameron" with "certifications. Mr. Kameron"

[Reply](#)

[Open](#)

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Format indent first line, indent left

[Reply](#)

[Open](#)

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Format indent first line, indent left

[Reply](#)

[Open](#)

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Format indent first line, indent left

[Reply](#)

[Open](#)

(b) (6) - QQC-C • 7:00 PM, Dec 31, 1969 (EST) New

Add "Re"

[Reply](#)

[Open](#)

 2 resolved

Suggestions

(b) (6) - QQC-C • 4:16 PM, Jun 10 (EDT)

Replace "(b) (6)" with "M"

(b) (6) - QQC-C • 4:22 PM, Jun 10 (EDT) New

Rejected suggestion

[Reply](#)

[Open](#)

(b) (6) - QQC-C • 4:18 PM, Jun 10 (EDT)

Delete paragraph

Delete space

(b) (6) - QQC-C • 4:23 PM, Jun 10 (EDT) New

Accepted suggestion

[Reply](#)

[Open](#)

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

You have received this email because you are a participant in the updated discussion threads. [Change what Google Docs sends you](#). You cannot reply to this email.




Date: Wed, 15 Jun 2022 14 03:03 -0700
Reply-to: No Reply <d+noreply@docs.google.com>
Message-ID: <fUDgrud05vJHkLzEH8c9Q@notifications.google.com>
Subject: **MBL Technologies In Remediation 15JUN2022**
From: "Jennifer Carlson - QQC-C (Google Docs)" <comments-noreply@docs.google.com>
To: laurie.southerton@gsa.gov
X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: 31c38637b8d6335f5ac1e283b5657e7f


New activity in the following document

 MBL Technologies In Remediation 15JUN2022

 2 comments

Partner


 Jennifer Carlson - QQC-C • 4:42 PM, Jun 15 (EDT) **New**
we have no options, we are stuck, as we discussed.THEY do have options.

 Jennifer Carlson - QQC-C • 4:43 PM, Jun 15 (EDT) **New**
Marked as resolved

[Reply](#)


[Open](#)


Thursday June 16 - 2-2:30P or 3:30-P Monday June 20 - 10-10:30AM, or 1-1 30P


 Jennifer Carlson - QQC-C • 4:53 PM, Jun 15 (EDT) **New**
[@john.hamilton@gsa.gov](#) will these times work for you? – i was guessing by your Calendar – and i know you are out most of next week.


[Reply](#)

[Open](#)

 1 suggestion

 Laurie Southerton - QQC-C • 4:40 PM, Jun 15 (EDT)
Add "you are"

 Jennifer Carlson - QQC-C • 4:41 PM, Jun 15 (EDT) **New**
how about that instead

 Jennifer Carlson - QQC-C • 4:41 PM, Jun 15 (EDT) **New**
Rejected suggestion


[Reply](#)


[Open](#)


 2 resolved

Comments

Unfortunately, we just learned from the American Association for Laboratory Accreditation ((the organization that certifies FedRAMP 3PAOs) that the staff that performed the Assessment for Issio were not certified to perform FedRAMP assessments.

 Jennifer Carlson - QQC-C • 4:39 PM, Jun 15 (EDT)
laurie, do we have a title for A2LA for us besides what i wrote

 Laurie Southerton - QQC-C • 4:41 PM, Jun 15 (EDT)
It looks fine Jen - very good

 Jennifer Carlson - QQC-C • 4:43 PM, Jun 15 (EDT) **New**
Marked as resolved

[Reply](#)

[Open](#)

Suggestions



Laurie Southerton - QQC-C • 4:41 PM, Jun 15 (EDT)

Replace "that" with "who"



Jennifer Carlson - QQC-C • 4:43 PM, Jun 15 (EDT) **New**

Accepted suggestion

[Reply](#)

[Open](#)

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

You have received this email because you are a participant in the updated discussion threads. [Change what Google Docs sends you](#). You cannot reply to this email.



From: John Hamilton <william.hamilton@gsa.gov>
Date: Wed, 15 Jun 2022 16:59:06 -0400
Message-ID: <CADR9bRrk+HoZicRGBbFKUOPzt+LLTipndzss1C6Vq+fq2AOfcA@mail.gmail.com>
Subject: Re: [External] Action Needed: MBL Technologies Formal Complaint Notice
To: (b) (6) <(b) (6)@mbstechnologies.com>
Cc: FedRAMP <FedRAMP@mbstechnologies.com>, Brian Conrad - QQC <brian.conrad@gsa.gov>, Laurie Southerton - QQC-C <Laurie.Southerton@gsa.gov>, Jennifer Carlson - QQC-C <jennifer.carlson@gsa.gov>, Ashley Kamauf <(b) (6)@a2la.org>, Bibi Abdullah <(b) (6)@a2la.org>, info fedramp <info@fedramp.gov>, (b) (6) <(b) (6)@mbstechnologies.com>
X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: 3309a76736e0facb44ee867dfc5e556b

@Jenny and Laurie - Can you direct (b) (6) to the latest version of the SAR the team reviewed in MAX

Thanks all -
John

On Wed, Jun 15, 2022 at 4:44 PM (b) (6) <(b) (6)@mbstechnologies.com> wrote:

Thanks, John Please send the version you are working with

Many thanks,

(b) (6)

From: John Hamilton <william.hamilton@gsa.gov>
Sent: Wednesday, June 15, 2022 4:43 PM
To: (b) (6) <(b) (6)@mbstechnologies.com>
Cc: FedRAMP <FedRAMP@mbstechnologies.com>, Brian Conrad - QQC <brian.conrad@gsa.gov>, Laurie Southerton - QQC-C <Laurie.Southerton@gsa.gov>, Jennifer Carlson - QQC-C <jennifer.carlson@gsa.gov>, Ashley Kamauf <(b) (6)@a2la.org>, Bibi Abdullah <(b) (6)@a2la.org>, info fedramp <info@fedramp.gov>, (b) (6) <(b) (6)@mbstechnologies.com>
Subject: Re: [External] Action Needed: MBL Technologies Formal Complaint Notice

(b) (6) - Yes, there was a transition timeline of 6 months for organizations to become compliant if they didn't currently have staff onboard that were qualified to perform FedRAMP assessments

But in this case, the assessors that were utilized were not in compliance with either the old version of the R311 or the newly released version

Regards -
John

On Wed, Jun 15, 2022 at 4:35 PM (b) (6) <(b) (6)@mbstechnologies.com> wrote:

John

Thank you for your prompt response We do understand and are prepared to develop a CAP but we also want to insure we are all on the same page with regard to the new personnel requirements A2LA gave 3PAOs a 6 month transition time period to allow personnel to become compliant This ended January 1, 2022 I have attached the memo from A2LA which confirms this

We would like clarification on this issue as we believe this drives a portion of our CAP response

Regards,

(b) (6)

From: John Hamilton <william.hamilton@gsa.gov>
Sent: Wednesday, June 15, 2022 4:08 PM
To: (b) (6) <(b) (6)@mbstechnologies.com>
Cc: FedRAMP <FedRAMP@mbstechnologies.com>, Brian Conrad - QQC <brian.conrad@gsa.gov>, Laurie Southerton - QQC-C <Laurie.Southerton@gsa.gov>, Jennifer Carlson - QQC-C <jennifer.carlson@gsa.gov>, Ashley Kamauf <(b) (6)@a2la.org>, Bibi Abdullah <(b) (6)@a2la.org>, info fedramp <info@fedramp.gov>, (b) (6) <(b) (6)@mbstechnologies.com>
Subject: Re: [External] Action Needed: MBL Technologies Formal Complaint Notice

(b) (6)

According to A2LA's records, Eric Beasley and Kameran Evans also did not meet the certification requirements for the previous version of the

R311 when the SAR was first created in 2020. The last Issio SAR reviewed by the PMO was dated 9/13/21, which means the current version of the R311 (released on 6/29/21) was in place. Fur her, MBL performed post-SAR assessment activities that were documented in undated attestation statements posted by Eric Beasley to the MAX repository on 5/6/20 and 6/9/22.

As initially requested, we're looking for a remediation plan related to these concerns within 10 business days of this notice.

Thank you -
John

On Wed, Jun 15, 2022 at 2:47 PM (b) (6) (b) (6) (b) (6) <(b) (6)@mbotechnologies.com> wrote:

Good afternoon

This has been received Before we respond, I would like to confirm that this is referencing the SAR that was sent to the PMO November 12, 2020? If so, this was performed well before the A2LA Personnel requirements change which were announced in the updated R311 dated October 12, 2021

We would like to set up a call to discuss this We are concerned we are being penalized because the PMO is upholding current standards to an assessment that was performed in 2020 Please advise us of your schedule

Regards,

(b) (6)

From: John Hamilton <william.hamilton@gsa.gov>
Sent: Wednesday, June 15, 2022 2:16 PM
To: (b) (6) (b) (6) (b) (6) (b) (6)@mbotechnologies.com; FedRAMP <FedRAMP@mbtechnologies.com>
Cc: Brian Conrad - QQC <brian.conrad@gsa.gov>; Ashley Kamauf <(b) (6)@a2la.org>; Bibi Abdullah <(b) (6)@a2la.org>; info.fedramp <info@fedramp.gov>
Subject: [External] Action Needed: MBL Technologies Formal Complaint Notice

(b) (6) -

After reviewing MBL Technologies' security assessment report (SAR) for Issio Information System, the FedRAMP PMO identified several fundamental testing accuracy and completeness issues associated with the assessment. Additionally, it was confirmed by A2LA that the assessors utilized for this assessment do not meet the personnel requirements specified in the [A2LA R311 - Specific Requirements: Federal Risk and Authorization Management Program \(FedRAMP\)](#). Please see the enclosed letter for more information related to these concerns.

Based on the severity of the issues noted above and, in accordance with [FedRAMP's 3PAO Obligations and Performance Standards](#), your FedRAMP recognition status is now "In-Remediation" and will be noted as such on your FedRAMP Marketplace page. Please consider this a formal complaint that needs to be addressed with your quality system. Within 10 business days of this notification, a written formal corrective action plan (CAP) response must be provided both to the FedRAMP PMO and A2LA ([via info@fedramp.gov](#) and [fedramp@a2la.org](#)) that identifies the root cause, how and when the deficiencies will be remediated, and actions that will be taken to correct these issues. At a minimum, all corrective actions must occur and be approved by the FedRAMP PMO prior to the submission of any new assessment deliverables to the FedRAMP PMO.

If MBL Technologies fails to complete the formal CAP, your organization's FedRAMP recognition status will be removed from the FedRAMP Marketplace. In some cases resolution may require a re-assessment by A2LA for validation of the successful completion of the CAP, as determined by FedRAMP.

Please don't hesitate to reach out if you have any further questions.

Thank You -

--

John Hamilton

FedRAMP Program Manager of Security Operations

Technology Transformation Service | GSA

(b) (6)

|

[william.hamilton@gsa.gov](#)

--

John Hamilton

FedRAMP Program Manager of Security Operations

Technology Transformation Service | GSA

(b) (6)

|

william.hamilton@gsa.gov

--

John Hamilton

FedRAMP Program Manager of Security Operations

Technology Transformation Service | GSA

(b) (6)

|

william.hamilton@gsa.gov

--

John Hamilton

FedRAMP Program Manager of Security Operations

Technology Transformation Service | GSA

(b) (6) | william.hamilton@gsa.gov

From: (b) (6) <(b) (6)@mbstechnologies.com>
To: John Hamilton <william.hamilton@gsa.gov>
Cc: FedRAMP <FedRAMP@mbstechnologies.com>, Brian Conrad - QQC <brian.conrad@gsa.gov>, Laurie Southerton - QQC-C <Laurie.Southerton@gsa.gov>, Jennifer Carlson - QQC-C <jennifer.carlson@gsa.gov>, Ashley Kamauf <(b) (6)@a2la.org>, Bibi Abdullah <(b) (6)@a2la.org>, info fedramp <info@fedramp.gov>, (b) (6) <(b) (6)@mbstechnologies.com>
Subject: RE: [External] Re: [External] Action Needed: MBL Technologies Formal Complaint Notice
Date: Wed, 15 Jun 2022 22:59:08 +0000
Message-ID: <DS0PR19MB64798BBEF270A4104DE22FCBF8AD9@DS0PR19MB6479.namprd19.prod.outlook.com>
X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: 0c7a7e512681f708745297da9ee0a822

Thank you, John.

Have a great evening.

(b) (6)

From: John Hamilton <william.hamilton@gsa.gov>
Sent: Wednesday, June 15, 2022 6:23 PM
To: (b) (6) <(b) (6)@mbstechnologies.com>
Cc: FedRAMP <FedRAMP@mbstechnologies.com>, Brian Conrad - QQC <brian.conrad@gsa.gov>, Laurie Southerton - QQC-C <Laurie.Southerton@gsa.gov>, Jennifer Carlson - QQC-C <jennifer.carlson@gsa.gov>, Ashley Kamauf <(b) (6)@a2la.org>, Bibi Abdullah <(b) (6)@a2la.org>, info fedramp <info@fedramp.gov>, (b) (6) <(b) (6)@mbstechnologies.com>
Subject: [External] Re: [External] Action Needed: MBL Technologies Formal Complaint Notice

(b) (6) - Thanks for letting us know the areas of confusion; please see the attached, revised CAP letter that clarifies your initial questions around the personnel requirements and what version of the R311 MBL was not in compliance with during the time first SAR was developed.

I've also attached the previous version of the R311, dated 12/20/19, for your reference.

If you have any additional questions, please let me know.

Thank You -
John

On Wed, Jun 15, 2022 at 5:08 PM (b) (6) <(b) (6)@mbstechnologies.com> wrote:

Thanks John. Really appreciate you help. We are trying to understand which version of the R311 you are referring to when you say our assessors were not in compliance with either the old version of the R311 or new version. We are a bit confused as the complaint letter indicates our assessors did not have the "required certifications", however the R311 that we are looking at that was in place back in 2020 did not have certification requirements. The June 2021 R311 introduced them and gave 3PAOs a transition period until January 1, 2022.

Sorry to be a pain, we are struggling with the rationale behind this complaint. Happy to have a call to discuss.

(b) (6)

From: John Hamilton <william.hamilton@gsa.gov>
Sent: Wednesday, June 15, 2022 4:59 PM
To: (b) (6) <(b) (6)@mbstechnologies.com>
Cc: FedRAMP <FedRAMP@mbstechnologies.com>, Brian Conrad - QQC <brian.conrad@gsa.gov>, Laurie Southerton - QQC-C <Laurie.Southerton@gsa.gov>, Jennifer Carlson - QQC-C <jennifer.carlson@gsa.gov>, Ashley Kamauf <(b) (6)@a2la.org>, Bibi Abdullah <(b) (6)@a2la.org>, info fedramp <info@fedramp.gov>, (b) (6) <(b) (6)@mbstechnologies.com>
Subject: Re: [External] Action Needed: MBL Technologies Formal Complaint Notice

@Jenny and Laurie - Can you direct (b) (6) to the latest version of the SAR the team reviewed in MAX.

Thanks all -
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Thanks, John. Please send the version you are working with.

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(b) (6)

From: John Hamilton <william.hamilton@gsa.gov>
Sent: Wednesday, June 15, 2022 4:43 PM
To: (b) (6) <(b) (6)@mbstechnologies.com>
Cc: FedRAMP <FedRAMP@mbstechnologies.com>, Brian Conrad - QQC <brian.conrad@gsa.gov>, Laurie Southerton - QQC-C <Laurie.Southerton@gsa.gov>, Jennifer Carlson - QQC-C <jennifer.carlson@gsa.gov>, Ashley Kamauf <(b) (6)@a2la.org>, Bibi Abdullah <(b) (6)@a2la.org>, info fedramp <info@fedramp.gov>, (b) (6) <(b) (6)@mbstechnologies.com>
Subject: Re: [External] Action Needed: MBL Technologies Formal Complaint Notice

(b) (6) - Yes, there was a transition timeline of 6 months for organizations to become compliant if they didn't currently have staff onboard that were qualified to perform FedRAMP assessments.

But in this case, the assessors that were utilized were not in compliance with either the old version of the R311 or the newly released version.

Regards -
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On Wed, Jun 15, 2022 at 4:35 PM (b) (6) <(b) (6)@mbstechnologies.com> wrote:

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From: John Hamilton <william.hamilton@gsa.gov>
Sent: Wednesday, June 15, 2022 4 08 PM
To: (b) (6) (b) (6) (b) (6) <mbltechnologies.com>
Cc: FedRAMP <FedRAMP@mbltechnologies.com>; Brian Conrad - QQC <brian.conrad@gsa.gov>; Laurie Southerton - QQC-C <Laurie.Southerton@gsa.gov>; Jennifer Carlson - QQC-C <jennifer.carlson@gsa.gov>; Ashley Kamauf <(b) (6) @a2la.org>; Bibi Abdullah <(b) (6) @a2la.org>; info fedramp <info@fedramp.gov>; (b) (6) (b) (6) <mbltechnologies.com>
Subject: Re: [External] Action Needed: MBL Technologies Formal Complaint Notice

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Thank you -
John

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Regards,

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From: John Hamilton <william.hamilton@gsa.gov>
Sent: Wednesday, June 15, 2022 2:16 PM
To: (b) (6) (b) (6) (b) (6) <mbltechnologies.com>; FedRAMP <FedRAMP@mbltechnologies.com>
Cc: Brian Conrad - QQC <brian.conrad@gsa.gov>; Ashley Kamauf <(b) (6) @a2la.org>; Bibi Abdullah <(b) (6) @a2la.org>; info fedramp <info@fedramp.gov>
Subject: [External] Action Needed: MBL Technologies Formal Complaint Notice

(b) (6) -

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Please don't hesitate to reach out if you have any further questions.

Thank You -
--
John Hamilton
FedRAMP Program Manager of Security Operations

Technology Transformation Service | GSA
(b) (6)
|
william.hamilton@gsa.gov

--
John Hamilton
FedRAMP Program Manager of Security Operations

Technology Transformation Service | GSA
(b) (6)
|
william.hamilton@gsa.gov

--
John Hamilton
FedRAMP Program Manager of Security Operations

Technology Transformation Service | GSA
(b) (6)
|
william.hamilton@gsa.gov

From: Bailey Feldman - QQC-C <bailey.feldman@gsa.gov>
Date: Fri, 10 Jun 2022 11:34:14 -0400
Message-ID: <CAOrokZ-EwdgN3ywnY-COMZa7Y9PtsiqTMAITSWJG+JYCGxQKOA@mail.gmail.com>
Subject: Re: 3PAO Contact List
To: Laurie Southerton - QQC-C <laurie.southerton@gsa.gov>
X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: c50ba15d1866a1dd7398e7f5a68f7dec

Thank you!

On Thu, Jun 9, 2022 at 12:22 PM Laurie Southerton - QQC-C <laurie.southerton@gsa.gov> wrote:
FYI Bailey - in case you didn't get a copy

----- Forwarded message -----
From: John Hamilton <william.hamilton@gsa.gov>
Date: Tue, Jun 7, 2022 at 10:46 AM
Subject: Re: 3PAO Contact List
To: Ashley Kamauf <(b) (6) @a2la.org>
Cc: William Hamilton - XAAB <john.hamilton@gsa.gov>, laurie.southerton@gsa.gov <laurie.southerton@gsa.gov>, (b) (6) - TAC-C <(b) (6) @gsa.gov>

Hi Ashley - Many thanks for providing this list!

Yes, if you could please reach out to Digital Forge again that would be great; it could be they have yet to send us all of the requested information to have their Marketplace page created

Best -
John

On Fri, Jun 3, 2022 at 9:54 AM Ashley Kamauf <(b) (6) @a2la.org> wrote:

Hey all

Please see the table below for the contact information for all current 3PAOs. The text is red for two exceptions – Digital Forge Cyber and Lazarus. Digital Forge was approved back in March but I did not see their listing on the Marketplace. Please let me know if we should reach out to them to follow up. And of course Lazarus – I figured I would include him depending on the timing of these comms.

3PAO	Contact	Email
Accenture Federal Services	(b) (6)	(6)
A-LIGN		
Booz Allen Hamilton		
Burke Consortium		
Cadence		
COACT		
Coalfire		
Controlcase		
Datalock Consulting		
Deloitte		
DOT ESC		
Digital Forge Cyber		
Earthling Security		
Emagine IT		
Excentium		
FTTS		
Fortreum		
GMS		
Ignyte		
InfusionPoints		
ITC		
Jacobs Technology		
KPMG		
Kratos		
Lazarus		
Linford		
Lunadine		
MBL		
MegaplanIT		
Mindpoint group		
NCC Group		

Tevora	(b) (6)
Vaultes	
Wilson Consulting	

Please let me know if you need anything else.

Thanks!

Ashley Kamauf

A2LA | Cybersecurity Program Manager

Direct: (b) (6) | (b) (6) @A2LA.org

My Hours: 8:00 am - 4 00 pm (ET)

A2LA Office Hours: 8:00 am - 8:00 pm (ET)

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--
John Hamilton
FedRAMP Program Manager of Security Operations
Technology Transformation Service | GSA
(b) (6) | william.hamilton@gsa.gov

Date: Fri, 10 Jun 2022 16:50:47 -0400
Message-ID: <CAH6vP019=dBtW_mGd1d+W404dZdJkKD+LGs2AkooA6xorzDecA@mail.gmail.com>
Subject: **Re: Document shared with you "MBL Technologies Assessment of Issio 10JUN2022"**
From: Laurie Southerton - QQC-C <laurie.southerton@gsa.gov>
To: (b) (6) QQC-C <(b) (6)@gsa.gov>
X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: 1386b75c32a2caf6c08ebb1d959fad66


Nope! You did *grrrrrreat!* I just followed along after you to save some time! That is how we have to do things in the Agency review and RAR lanes. It works
I will attempt to carve out some time tomorrow to cite the issues we need. That way on Monday, it will be good to go for your final spin-through
Thank you so very much (b) (6)
Laurie

On Fri, Jun 10, 2022 at 4:45 PM Evan Isaacs - QQC-C <(b) (6)@gsa.gov> wrote:
I made a mess of the doc! I see you going through it now. I'll take a look again on Monday and clean it up - I did track changes so you could see everything
(b) (6)

On Fri, Jun 10, 2022 at 1:02 PM (b) (6) QQC-C <(b) (6)@gsa.gov> wrote:
Thanks - I will be able to take a look at it at the end of the day and will add any comments. Have a great weekend!

On Fri, Jun 10, 2022 at 12:51 PM Laurie Southerton - QQC-C (via Google Docs) <drive-shares-dm-noreply@google.com> wrote:

laurie.southerton@gsa.gov shared a document




laurie.southerton@gsa.gov has invited you to **edit** the following document:

Here is what I started. I will get back to it at 1330.

MBL Technologies Assessment of Issio 10JUN2022


Open

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
You have received this email because laurie.southerton@gsa.gov shared a document with you from Google Docs. Google Workspace




U.S. General Services Administration

(b) (6)
Technology Transformation Services
Program Management Office, FedRAMP



U.S. General Services Administration

(b) (6)
Technology Transformation Services
Program Management Office, FedRAMP



Laurie Southerton
FedRAMP PMO Support (Noblis)
[FedRAMP | TTS | GSA](#)
m: (b) (6)
e: Laurie.Southerton@gsa.gov

Date: Fri, 10 Jun 2022 17:03 54 -0400
Message-ID: <CAH6vP01+BmjuWwE3TBzMCqv_WNXSYCJqNs56mA+vULVXzKvc8g@mail.gmail.com>
Subject: **Re: End to End Notes for Review Meeting 6-15-22**
From: Laurie Southerton - QQC-C <laurie.southerton@gsa.gov>
To: Jennifer Carlson - QQC-C <jennifer.carlson@gsa.gov>
Cc: Cynthia Bergevin - QQC-C <cynthia.bergevin@gsa.gov>, (b) (6) - QQC-C <(b) (6)@gsa.gov>, (b) (6) - QQC-C <(b) (6)@gsa.gov>, William Hamilton - QQC <john.hamilton@gsa.gov>
X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: c5d345b0d54e4d941b415a6325c64469

Hi Jen,

I have included John and (b) (6) on this thread (b) (5)

(b) (5) I will use Evan's revised and finessed MBL letter as a template ()

Laurie

On Fri, Jun 10, 2022 at 1:31 PM Jennifer Carlson - QQC-C <jennifer.carlson@gsa.gov> wrote:
Super bizarre question – I am not understanding – Linford and CO is 3PAO, yet THEY hired (as sub, i take it) Cadence as pen tester? They are fully responsible for the Pen Test – if they cannot get their sub in to address issues, its on them to get it fixed/re-done – whatever they need to do (and they should not charge CSP extra for the effort)

jc

On Fri, Jun 10, 2022 at 9:47 AM (b) (6) <(b) (6)@linfordco.com> wrote:
Hi (b) (6) -

It was really to talk through a situation (b) (4)

Thanks

Kind regards,

(b) (6)

On Fri, Jun 10, 2022 at 6:57 AM (b) (6) - QQC-C <(b) (6)@gsa.gov> wrote:
Good morning (b) (6),
Can you please give us some specific questions you need? We may be able to get away without a meeting and save some time :)

Yours Truly,
(b) (6)

—
(b) (6) Ostergaard, JD
FedRAMP PMO Support (Noblis)
[FedRAMP | ITS | GSA](#)
(b) (6) <(b) (6)@gsa.gov>

----- Forwarded message -----
From: (b) (6) <(b) (6)@linfordco.com>
Date: Thu, Jun 9, 2022 at 3:35 PM
Subject: Re: End to End Notes for Review Meeting 6-15-22
To: (b) (6) - QQC-C <(b) (6)@gsa.gov>

Hi (b) (6) -

(b) (4) Is there a time on Monday (or Tuesday) that works for you? Thanks

Kind regards,

(b) (6)

Comments from PMO:
(b) (5)

On Wed, May 25, 2022 at 10:23 AM (b) (6) - QQC-C <(b) (6)@gsa.gov> wrote:
Good afternoon End to End Team,

We're looking forward to meeting with you. Please find the attached draft review report in response to your submitted system package, and detailed instructions for conducting remediation and the review meeting. These instructions are designed and time-tested to shorten your timeline to Authorization.

This report provides a level of detail that is intended to be helpful in your remediation efforts for FedRAMP Authorization. At the end of the meeting, we will prioritize follow-on actions, in particular those requiring technical remediation prior to FedRAMP Authorization.

The dominant part of the conversation will revolve around:

1. Where federal data resides in the system -- that is, not just purposefully in the boundary, but also in corporate and external systems.
2. Encryption of flows, internal, external, and in storage. Please be prepared to tell us where there is *not* encryption on federal data in the system.

To help make the rest of this Authorization process as efficient as possible, we have attached both a PDF and an excel version of the Draft Review Report.

1. The PDF is for posterity, so anyone in the future can come back to this point in time.
2. The excel is to track each party's questions, comments, and actions taken to address each item, in the pre-labelled columns.
3. **Please upload *this commented-on version* to MAX a day or 2 ahead of the Review Mtg (the main folder with the Initial Checklist is good).**

We will use your updated version of the report as the presentation and agenda in the Review Meeting.

1. End to End will present to the group; choose who will present beforehand.
2. The presenter is encouraged to acquaint themselves with Google Meet, and join the meeting early to test it out. I will be online ~10 minutes before the meeting starts.
3. We will start in Section B and work line-by-line all the way through to the POA&M in Section G.
4. The last topic we will cover in the Review Mtg is logistics/next steps/timelines.
5. PMO will follow-up after the Review Mtg with:
 - a. Notes from the meeting. These will, just like today, be both in PDF and excel form. CSP/3PAO will again be expected to annotate their actions taken in remediation in the excel sheet.
 - b. A list of next steps and logistics.

Time-saving best practices we have found are:

1. **Start making updates now.** The more actions addressed from the report now, the shorter the overall timeline to Authorization will be.
2. Please keep track changes on your SSP as you're updating -- we will want to see all the updates you make to the version you gave us for our initial review.

In context of where we are now in the Authorization process:

- Full Package Submission
- Initial Review Phase
- Conduct Review Mtg: PMO, CSP, 3PAO, and Agency meet to answer questions and address concerns found in the Initial Review. ← **End to End is currently at this point.**
- Remediation Phase: CSP/3PAO make required updates. When complete reupload to MAX and alert PMO
- Gap Review Phase: PMO usually takes ~10 days to complete and reach out for a Gap Review Mtg or send the Congratulations Email
- The Congratulations email will come from PMO Leadership and contain 2 forms, a survey, and a request to check Marketplace service description.
- When those are returned, the Marketplace designation will be changed to **FedRAMP Authorized!**

Thank you, and we'll talk to you soon!

Yours Truly,

(b) (6)

(b) (6)

FedRAMP PMO Support (Noblis)

[FedRAMP](#) | [TTS](#) | [GSA](#)

(b) (6) [@gsa.gov](#)



FedRAMP

Jennifer Carlson

FedRAMP PMO Support (Noblis)

[FedRAMP](#) | [TTS](#) | [GSA](#)

m: (b) (6)

e: jennifer.carlson@gsa.gov



FedRAMP

Laurie Southerton

FedRAMP PMO Support (Noblis)

[FedRAMP](#) | [TTS](#) | [GSA](#)

m: (b) (6)

e: Laurie.Southerton@gsa.gov

Date: Wed, 15 Jun 2022 12 06:26 -0400
Message-ID: <CAH6vP0032eytoRdvefXe5HtJycxuMBPUUiZ6dR=_PTVcBEqFw@mail gmail.com>
Subject: **re Issio and MBL Technologies**
From: Laurie Southerton - QQC-C <laurie.southerton@gsa.gov>
To: William Hamilton - QQC <john.hamilton@gsa.gov>
X-Source-Folder: GSA-2022-001178--laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: 9d5a8abaf4040f0d6e0b66adc64d03f2


John,

I know Jen finished the review but even for a Low package that thing was bad

We need to turn them away and tell them to come back when the AGENCY and the 3PAO can attest that all the work was done The CSP does not get FedRAMP Authorized until that attestation by the Agency and the 3PAO shows up

Laurie

--



FedRAMP

Laurie Southerton
FedRAMP PMO Support (Noblis)
[FedRAMP](#) | [TTS](#) | [GSA](#)
m: (b) (6)
e: Laurie.Southerton@gsa.gov

Significant changes to the CSO should be recorded in the FedRAMP Significant Change Form (located on FedRAMP.gov/Templates under Continuous Monitoring Phase) or via a similar form, as directed by the authorizing agency. The Significant Change Form (or equivalent) should be completed and provided to the authorizing agency AO for review, approval, and signature. The final completed/approved form should be uploaded to the CSP's MAX secure repository within the "Significant Changes" subdirectory under Continuous Monitoring. Lastly, the CSP should send an email to info@fedramp.gov notifying the FedRAMP PMO that a significant change form has been completed and is available for review within the secure repository. All significant changes should be assessed and validated by the 3PAO/independent assessor, as determined necessary by a Security Impact Analysis (SIA). The FedRAMP PMO performs periodic checks of FedRAMP Authorized packages for significant changes and may contact the CSP with follow-up questions or concerns.

Charles Solomon-Jackson charles.solomon-jackson@va.gov
va-fedramp-pmo@va.gov

Eric Beasley (b) (6) [@mbtechnologies.com](mailto:(b) (6)@mbtechnologies.com)
(b) (6) [mbtechnologies.com](mailto:(b) (6)@mbtechnologies.com)

--



FedRAMP

Jennifer Carlson

FedRAMP PMO Support (Noblis)

[FedRAMP](#) | [TTS](#) | [GSA](#)

m (b) (6)

e: jennifer.carlson@gsa.gov

--

John Hamilton
FedRAMP Program Manager of Security Operations
Technology Transformation Service | GSA
(b) (6) | william.hamilton@gsa.gov

From: Ashley Kamauf <(b) (6) @a2la.org>
To: "laurie.southerton@gsa.gov" <laurie.southerton@gsa.gov>
CC: William Hamilton - QQC <john.hamilton@gsa.gov>; (b) (6) - QQC-C <(b) (6) @gsa.gov>
Subject: RE: MBL Technologies
Date: Thu, 9 Jun 2022 16:50:09 +0000
Message-ID: <SA0PR19MB4285FBF1E5418C0CD4D210D184A79@SA0PR19MB4285.namprd19.prod.outlook.com>
X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: d9f92b3e34bf895e39b1db2062bf15b1

Hey Laurie

Apologies for the delay – we are still going through our peer evaluation this week.

Neither of the individuals noted below are currently being used to meet the certification requirements as I understand it. It looks like they are utilizing:

Senior Assessor (b) (6) (CISSP CISA, CISM)
Junior Assessor (b) (6) (CISSP) (b) (6) (CISSP)
Pen Tester (b) (6) (CISSP OSCP)

I am not sure why Eric and (b) (6) were the point people on this call as they should only be playing supporting roles without the appropriate certifications.

I apologize for not having any additional insight but please let me know if I need to follow up in any way.

Thanks!

Ashley Kamauf
A2LA | Cybersecurity Program Manager
Direct: (b) (6) | akamauf@A2LA.org
My Hours: 8:00 am - 4:00 pm (ET)

A2LA Office Hours: 8:00 am - 8:00 pm (ET)

From: Laurie Southerton - QQC-C <laurie.southerton@gsa.gov>
Sent: Monday, June 6, 2022 1:10 PM
To: Ashley Kamauf <(b) (6) @a2la.org>
Cc: William Hamilton - QQC <john.hamilton@gsa.gov>; Evan Isaacs - QQC-C <evan.isaacs@gsa.gov>
Subject: MBL Technologies

Ashley,

My colleagues just got out of a meeting where MBL Technologies was the 3PAO, specifically Eric Beasley, (b) (6). I see that Eric is in the db as both Senior Assessor and Assessor but he has no certs (b) (6) is a Junior Assessor and has no certs.

It is reported to me that Eric, more so than (b) (6), was in over his head as the Assessor. He failed to answer most of the Review Team's questions.

Do you have any insight on these two folks?

Laurie

--

Laurie Southerton




FedRAMP PMO Support (Noblis)

[FedRAMP](#) | [TTS](#) | [GSA](#)

m: (b) (6)

e: Laurie.Southerton@gsa.gov

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Date: Fri, 10 Jun 2022 13:56:16 -0400
Message-ID: <CAH6vP00grq9rjVF+q4WSF8SBzavr9mNVg5kTHnSW_GJPBrH+7w@mail.gmail.com>
Subject: **Re: MBL Technologies**
From: Laurie Southerton - QQC-C <laurie.southerton@gsa.gov>
To: (b) (6) - QQC-C (b) (6) @gsa.gov
Cc: John Hamilton <william.hamilton@gsa.gov>, Ashley Kamauf (b) (6) @a2la.org, William Hamilton - QQC <john.hamilton@gsa.gov>
X-Source-Folder: GSA-2022-001178-laurie.southerton@gsa.gov_0
X-Email-Hash-MD5: 826ab0a6070bcd21a827b1fcc59b713

(b) (6)

The draft is created I know Ashley does not have access to it but I included Ashley so she is tracking with us

The draft is located here: (b) (6)

I can add more if needed I figured this is a good start

Laurie

On Fri, Jun 10, 2022 at 10:43 AM Evan Isaacs - QQC-C <(b) (6) @gsa.gov> wrote:
Hi John,

No problem Laurie - are you able to develop a draft and share it with me? I can review after

(b) (6)

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Ashley - Thank you for checking into this for us

@Laurie and (b) (6) - Let's plan on sending a consultation remediation notice to MBL regarding this personnel issue Can you work together to draft an email; we need to meet with MBL to talk about this and have them develop an internal CAP following our convo

Thanks all -
John

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Ashley,

That is too bad for MBL Technologies the only two folks in attendance for the meeting were
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(b) (6) , Y

The review meeting was very poorly orchestrated by these two representing the 3PAO Per the documentation provided for the CSO assessment both of these folks are the only two listed in the SAP and SAR:

Security Requirements for the system.

The members of the IA security testing team are found in Table 5-1 Security Testing Team.

Table 5-1 Security Testing Team

Name	Role	Contact Information
Eric Beasley	3PAO Manager	(b) (6) @mbtechnologies.com
(b) (6)	Assessor	(b) (6) @mbtechnologies.com

We now know why these folks (Beasley (b) (6)) were totally unprepared This is unacceptable

This is exactly the type of scenario with the 3PAOs that we are trying to eliminate

Laurie

On Thu, Jun 9, 2022 at 12:50 PM Ashley Kamauf <(b) (6) a2la.org> wrote:

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Cc: William Hamilton - QQC <john.hamilton@gsa.gov>; (b) (6) - QQC-C <(b) (6)@gsa.gov>
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Thank you

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(b) (6) | william.hamilton@gsa.gov



U.S. General Services Administration

Date: Fri, 10 Jun 2022 11:43:35 -0400
Message-ID: <CAH6vP028nDpf9zvUP7nPRD+rjCgIMK-M8Z1uFC+nvEt84j+YkQ@mail.gmail.com>
Subject: **Re MBL Technologies**
From: Laurie Southerton - QQC-C <laurie.southerton@gsa.gov>
To: (b) (6) - QQC-C (b) (6) @gsa.gov
Cc: John Hamilton <william.hamilton@gsa.gov>, Ashley Kamauf <(b) (6) a2la.org>, William Hamilton - QQC <john.hamilton@gsa.gov>
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Evan,

I will get to it and share the link

Laurie

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Direct: (b) (6) | (b) (6) [A2LA.org](#)

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Sent: Monday, June 6, 2022 1:10 PM
To: Ashley Kamauf <(b) (6) [a2la.org](#)>
Cc: William Hamilton - QQC <john.hamilton@gsa.gov>; (b) (6) - QQC-C <(b) (6) [@gsa.gov](#)>
Subject: MBL Technologies

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Laurie Southerton
FedRAMP PMO Support (Noblis)
[FedRAMP](#) | [TTS](#) | [GSA](#)
m: (b) (6)
e: Laurie.Southerton@gsa.gov

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--



FedRAMP

Laurie Southerton
FedRAMP PMO Support (Noblis)
[FedRAMP](#) | [TTS](#) | [GSA](#)
m: (b) (6)
e: Laurie.Southerton@gsa.gov

--

John Hamilton
FedRAMP Program Manager of Security Operations
Technology Transformation Service | GSA
(b) (6) | william.hamilton@gsa.gov

--



U.S. General Services Administration

Evan Isaacs
Technology Transformation Services
Program Management Office, FedRAMP